

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 22-CR-80173-CANNON

UNITED STATES OF AMERICA

Plaintiff,

vs.

WILLIAM SPEARMAN,

Defendant.

_____ /

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

Defendant, WILLIAM SPEARMAN, through counsel submits the following proposed voir dire questions:

1. Have you or any close friend or family member been the victim of any sexual assault, sexual molestation, or sexual harassment?
 - a. Please briefly describe the circumstances of that experience.
 - b. How do you think that experience would affect you if you serve as a juror and have to weigh the evidence and apply the law in this case?
2. Are you a parent or caretaker of children?
 - a. This case involves the alleged sexual exploitation of children, some of them very young. How do you think your experience as a parent or caretaker of children will impact your ability to be fair and impartial in this particular case?
3. Knowing that, if you are selected as a juror on this case, you will be required to view videos and photographs of children being sexually abused, do you think you will still be able to remain fair and impartial and follow the Court's instructions on the law?
 - a. Do you believe you could remain fair and impartial and follow those instructions even if doing so would require you to find the defendant not guilty?

4. Mr. Spearman has the absolute right not to testify in his own defense and, if he chooses to exercise that right, the law requires you not to hold it against him. Still, some people think that if a defendant does not testify, he must be hiding something while other people think that if he does testify, he must be lying. What do you think?
5. You will hear a recorded statement in this case allegedly made by the defendant. After you do, I will instruct you that you must consider that evidence with caution and great care. Do you have any thoughts about why the law requires you to consider that evidence so carefully? Please explain those thoughts.

Respectfully submitted,

MICHAEL CARUSO
FEDERAL PUBLIC DEFENDER

s/Scott Berry
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CERTIFICATE OF SERVICE

I HEREBY certify that on May 15, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/ Scott Berry
Scott Berry